

**Verisign Inc. Response to National Telecommunications and Information  
Administration Further Notice of Inquiry on the Internet Assigned Names and  
Numbers Authority (IANA) Functions  
[Docket No. 110207099-1319-0]**

**Introduction**

Verisign thanks NTIA for the opportunity to comment on the operation and administration of the IANA Functions contract. Effective execution and administration of the IANA functions is critical to the stability and security of the Internet, and Verisign applauds NTIA for its commitment to reviewing and strengthening the IANA functions contract. As steward of several key components of critical Internet infrastructure, Verisign has been honored to fulfill a small but important technical role in the execution of the IANA functions as they relate to root zone management. We offer the following input based on our experiences with the operation of IANA function and out of our commitment to upholding the security and stability of the Domain Name System (DNS).

As a baseline for discussing possible changes to the IANA contract, it is important to establish that the current contractual framework has been remarkably effective in supporting the stable execution of the IANA functions, particularly those involving the DNS and administration of the root zone. While the IANA contract can potentially benefit from modest, evolutionary changes, Verisign does not believe that it needs to be substantially overhauled, or that the current division of labor and responsibilities envisioned in the contract should be significantly changed. Verisign values the measured approach that NTIA has taken in its review of the IANA contract and response to public input. Although we do not propose any additional substantive changes to the IANA contract, we appreciate the opportunity to comment on three of the 10 questions raised in the Further Notice of Inquiry.

**2. Does the new “Provision C.2.2.1.1” adequately address concerns that the IANA functions contractor should refrain from developing policies related to the IANA functions? If not, please provide detailed comments and specific suggestions for improving the language.**

Verisign supports the language in C.2.2.1.1 as well as its stated intent to establish a clear demarcation between policymaking and technical management functions. Verisign strongly supports the mission and goals of the Internet Corporation for Assigned Names and Numbers (ICANN) and fully endorses its continued management of the IANA functions. As the nature of the Internet has evolved, ICANN has, by necessity, broadened its global mission beyond the baseline technical management functions envisioned in the White Paper. While much of this expansion has been necessary and worthwhile, it remains important that the IANA function itself remains a fundamentally a technical operation, and that the stewards of that function avoid even the appearance of political conflict. This provision will help to assure the community that the stewards of the IANA function remain fully committed to its technical mandate.

**4. Does the language in “Provision C.2.2.1.3” adequately address concerns**

**related to root zone management? If not, please suggest detailed alternative language. Are the timeframes for implementation reasonable?**

Verisign supports the division of labor and responsibilities established in the IANA contract, and believes the language included under C.2.2.1.3 will help to support that structural arrangement, while also providing important metrics to NTIA. The three-party relationship between the IANA contractor (ICANN), NTIA and Verisign has proven to be effective in ensuring the stable execution of the IANA functions.

Under the terms of that relationship, no single party, nor even two parties, can effect changes to the root without the engagement and review of the other two. The nature of this relationship offers two key advantages:

- The primary benefit of the three-party relationship is practical. Because root zone changes pass through three separate entities before they are executed, three separate groups of experienced experts are able to review those changes and to identify potential errors and stability risks. This is an important, functional and often-overlooked benefit of the three-party relationship. Each additional set of technical “eyes” that see a proposed change before it hits the root helps to minimize the likelihood that mistakes will make it all the way through the process. If all three sets of functions were to be relegated to any single entity, the likelihood of errors or stability threats sneaking through would increase significantly.
- Secondly, the relationship offers a check against any one party exerting unilateral operational control over the root, while also supporting the separation of policymaking and technical management functions. While all parties involved in the relationship have traditionally exhibited the highest levels of professionalism and respect for contract terms and the rules of the multistakeholder policy development process, it remains nonetheless valuable for the community to possess the confidence that no single entity can make unilateral technical changes to the root. Even absent any sort of oversight or decision-making capacity on the part of a party like Verisign, the simple structural requirement that changes pass through multiple trusted parties establishes a more solid foundation than would a single point of control. The overall structure supports the IANA operators’ strong focus on technical management.

The provision in C.2.2.1.3 calling for standardized metrics to document the IANA functions processes is important as it will provide a valuable tool for NTIA to track improvements in efficiency.

**9. Does the new “Section C.4 Performance Standards Metric Requirements” adequately address concerns regarding transparency in root zone management process, and performance standards and metrics? Should the contractor be required to gather and report on statistics regarding global IPv6 and DNSSEC deployment? If so, how should this requirement be reflected in the SOW? What statistics should be gathered and made public?**

An increased focus on performance metrics associated with the IANA functions is entirely consistent with an increased focus on metrics and transparency throughout the global community of Internet stakeholders. Through its bottom-up decision making process, ICANN has already made strides toward greater transparency and more effective use of performance metrics. Verisign fully supports those efforts and the goal of NTIA to introduce more transparency and measurement to the execution of the IANA functions. In particular, the development of an IANA “dashboard” will provide a valuable tool to Internet stakeholders to observe and analyze the performance of all parties involved with the coordination and execution of the IANA functions. Greater transparency will breed even greater community confidence in the effective administration and stewardship of these functions.

### **Conclusion**

On matters pertaining to Internet governance and oversight, Verisign supports the Hippocratic principle: “first, do no harm.” It is important to remind all stakeholders that the existing contractual framework for IANA has supported the stable, secure and efficient execution of those functions, which are critical to the operation of the Internet. Any substantive changes to that contract, therefore, must be weighed according to their potential for disrupting an efficient, effective and, above all, stable process. Verisign supports NTIA and its measured approach to evolving the IANA contract, and looks forward to supporting that evolutionary process in any way possible.